# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA **SOUTHERN DIVISION**

Case No. 7:23-cv-897

IN RE: CAMP LEJEUNE WATER LITIGATION	JOINT MOTION FOR ENTRY OF CASE MANAGEMENT ORDER – TRACK 1 TRIAL PLAINTIFF SELECTION PROTOCOL
This document relates to:	
ALL CASES	

The Plaintiffs' Leadership Group and the United States of America respectfully request the entry of the attached Case Management Order designating the process for identifying Plaintiffs from among the Track 1 Discovery Pool who will proceed to trial: the "Track 1 Trial Plaintiffs." A memorandum in support of this motion is being filed contemporaneously.

DATED this 3rd day of June, 2024.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*) Bell Legal Group, LLC 219 Ridge St. Georgetown, SC 29440

Telephone: (843) 546-2408 jeb@belllegalgroup.com Lead Counsel for Plaintiffs

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*)

Keller Postman LLC

111 Congress Avenue, Ste. 500

Austin, TX 78701

Telephone: 956-345-9462 zina.bash@kellerpostman.com Co-Lead Counsel for Plaintiffs and Government Liaison

Respectfully submitted,

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General Civil Division

J. PATRICK GLYNN

Director, Torts Branch

**Environmental Torts Litigation Section** 

BRIDGET BAILEY LIPSCOMB

Assistant Director, Torts Branch **Environmental Torts Litigation Section** 

/s/ Adam Bain ADAM BAIN

Special Litigation Counsel

**Environmental Torts Litigation Section** 

U.S. Department of Justice

P.O. Box 340, Ben Franklin Station

Washington, D.C. 20044

E-mail: adam.bain@usdoj.gov Telephone: (202) 616-4209

### /s/ Robin Greenwald

Robin L. Greenwald (admitted pro hac vice)

Weitz & Luxenberg, P.C.

700 Broadway

New York, NY 10003

Telephone: 212-558-5802

rgreenwald@weitzlux.com

Co-Lead Counsel for Plaintiffs

### /s/ Elizabeth Cabraser

Elizabeth Cabraser (admitted pro hac vice)

LIEFF CABRASER HEIMANN &

BERNSTEIN, LLP

275 Battery Street, Suite 2900

San Francisco, CA 94111

Phone (415) 956-1000

ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

# /s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)

The Dowling Firm PLLC

Post Office Box 27843

Raleigh, North Carolina 27611

Telephone: (919) 529-3351

mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

#### /s/ James A. Roberts, III

James A. Roberts, III (N.C. Bar No.: 10495)

Lewis & Roberts, PLLC

3700 Glenwood Avenue, Suite 410

P. O. Box 17529

Raleigh, NC 27619-7529

Telephone: (919) 981-0191

Fax: (919) 981-0199

jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs

## /s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)

Wallace & Graham, P.A.

525 North Main Street

Salisbury, North Carolina 28144

Tel: 704-633-5244

Co-Lead Counsel for Plaintiffs

LACRESHA A. JOHNSON
HAROON ANWAR
DANIEL C. EAGLES
NATHAN J. BU
Trial Attorneys, Torts Branch
Environmental Torts Litigation Section
Counsel for Defendant United States of America